

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

)	
)	Case No. 1:21-cv-00135
)	
In re Clearview AI, Inc. Consumer Privacy)	Judge Sharon Johnson Coleman
Litigation)	
)	Magistrate Judge Maria Valdez
)	

**CARLSON LYNCH’S MEMORANDUM IN SUPPORT OF SCOTT DRURY’S
APPLICATION FOR APPOINTMENT AS LEAD COUNSEL PURSUANT TO FED R.
CIV. P. 23(g)**

Carlson Lynch LLP, counsel for Plaintiffs in the action initially styled *Chris Marron and Maryann Daker v. Clearview AI, Inc., et al.*, No.: 1:20-cv-02989 (N.D. Ill., filed May 20, 2020), respectfully submits this memorandum in support of Scott Drury of Loevy & Loevy’s application for appointment as Lead Counsel.

We have a wealth of experience working with Mr. Drury in numerous class actions also arising from the collection of class members’ biometric data in violation of the Illinois Biometric Information Privacy Act, 740 ILCS 14/1, *et seq.* From our experience with Mr. Drury in these cases, styled *Vance v. International Business Machines Corporation*, No. 1:20-cv-577 (N.D. Ill), where our firm is currently serving as interim co-lead class counsel with Loevy & Loevy; *Vance v. Microsoft Corp.*, No. 2:20-cv-01082 (W.D. Wash.); *Vance v. Amazon.com, Inc.*, No. 2:20-cv-01084 (W.D. Wash.); *Vance v. Google LLC*, No. 5:20-cv-04696 (N.D. Cal.); and *Vance v. FaceFirst, Inc.*, No. 2:20-cv- 06244 (C.D. Cal.), we do not hesitate to recommend Mr. Drury for appointment as Lead Counsel in this matter.

Our recommendation is further bolstered by proposed Lead Counsel’s relentless work in pushing this case to where it is now. Mr. Drury has conducted an exhaustive investigation prior to filing the first of many successive actions against Defendants. Since filing, proposed Lead

Counsel has engaged in extensive briefing and motion practice to ensure this litigation was consolidated into the proper forum, promptly filed a motion for preliminary injunction that has already resulted in substantial relief for the proposed class, worked with Defendants to spearhead early discovery, and proactively organized a widely-attend mediation with all parties before the retired Judge Wayne Andersen (ret.).

Based on our firsthand experience with Mr. Drury in other biometric actions, as well as the leadership he has already demonstrated in this litigation, we are confident that Mr. Drury will exceed the Court's expectations and continue to vigorously seek relief for the proposed class. For these reasons, we support appointment of Mr. Drury as Lead Counsel.

Respectfully submitted,

Dated: February 22, 2021

By: /s/ Gary Lynch
Gary Lynch
glynch@garylynch.com
CARLSON LYNCH LLP
1133 Penn Avenue, 5th Floor
Pittsburgh, PA 15222
Telephone: (412) 322-9243

Katrina Carroll
kcarroll@carlsonlynch.com
Kyle A. Shamberg
kshamberg@carlsonlynch.com
Nicholas R. Lange
nlang@carlsonlynch.com
CARLSON LYNCH LLP
111 West Washington Street, Suite 1240
Chicago, Illinois 60602
Telephone: (312) 750-1265

Richard R. Gordon
Gordon Law Offices, Ltd.
111 W. Washington St.
Ste. 1240
Chicago, IL 60602

(312) 332-5200
rrg@gordonlawchicago.com

Counsel for Plaintiffs and the Putative Class

CERTIFICATE OF SERVICE

I, Gary Lynch, at attorney, hereby certify that on February 23, 2021, I filed the above document using the Court's CM/ECF system, which effectuated service on counsel of record.

/s/ Gary Lynch
One of Plaintiffs' Counsel